

Q. I would like to show you a drawing. The drawing shows the front of the property at Trail Avenue at the bottom of the drawing and it goes back to what appears to be marked as a fence here on the drawing behind an alley and this is the property described as 723 Trail Avenue. Does this look like an accurate drawing of the land?

A. Yes.

Q. You see a block garage here, a house here, you will see the alley here, and a fence back at the back. Can I ask you if all of this represents the property that you considered to be your own and used as your own?

A. Yes. The alley actually, when they put the alley in, they took the alley not only off of our ground but off of everybody on the street. So actually the alley belongs to us. It was on our property and then Mr. Cramer, whom my parents bought the house from never knew who owned this ground. My dad went down and asked him if we could build a garage there and he saw no reason why. Of course, back then, you didn't have to have a permit. My grandfather built the garage and we still worked the ground behind the garage.

Q. What did you do with the particular area of ground behind the alley?

A. Well, as I said, the garage and daddy had a vegetable garden.

Q. Did you consider it to be yours all the way back to the end of the lot?

A. Yes. In fact we even paid taxes on it.

Q. Did this consist of the entire period you lived there?

A. Well, we worked it and used it all that time. I don't exactly remember what time we actually started paying taxes on it.

Q. Just from the physical layout of the ground, you did start to use that piece as far back as you can remember.

A. Yes. As far as I can remember. I am sure I was at least six (6) years old.

Q. That then would be around 1930?

A. Yes.

Q. Did you use it continuously over the whole time you owned the property?

A. Yes, we did. And even after my father became ill, one of the neighbors still put the garden out and gave us the vegetables out of it. He did the gardening for daddy.

Q. Do you know if any other person ever claimed any right to that ground.

A. To our ground now, No.

Q. Did anyone else ever try to use the ground?

A. No. The only time they ever used it was when Daddy give them permission to make garden for him.

By Mr. Elliot:

I would like to introduce this drawing as Exhibit C.